

Exhibit 6

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS'
CONCUSSION INJURY LITIGATION

Kevin Turner and Shawn Wooden, on behalf of themselves
and others similarly situated,

Plaintiffs,

v.

National Football League and NFL Properties LLC,
successor-in-interest to NFL Properties, Inc.,

Defendants.

No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

CIVIL ACTION NO: 2:14-cv-
00029-AB

THIS DOCUMENT RELATES TO:
ALL ACTIONS

**AFFIDAVIT OF SHAWN WOODEN IN SUPPORT OF FINAL APPROVAL OF
SETTLEMENT AND CERTIFICATION OF CLASS AND SUBCLASSES**

STATE OF FLORIDA :
 :
COUNTY OF BROWARD :

I, Shawn Wooden, being duly sworn according to law, depose and state as follows:

1. I am a citizen of the State of Florida and I reside in Pembroke Pines, Florida. I am married to Marcia Wooden, who also resides in Pembroke Pines, Florida. I am a retired NFL football player. I played professional football in the NFL from 1996-2004. I played as a safety for the Miami Dolphins and the Chicago Bears. During my career in the NFL, I experienced repeated traumatic head impacts. Since my retirement from football, I have experienced neurological symptoms, including migraine headaches, sleep problems, concentration issues, and

mood swings. I have not been diagnosed with any neurocognitive impairment, but I am at increased risk of developing a range of neuromuscular and neurocognitive diseases associated with mild traumatic brain injuries, such as Dementia, Alzheimer's Disease, Parkinson's Disease, and/or Amyotrophic Lateral Sclerosis ("ALS"), as a result of having played professional football in the NFL. As a result, I am in need of medical monitoring. I submit this Affidavit in support of final approval of the Class Action Settlement ("Settlement") dated June 25, 2014 between the Plaintiff Class and Defendants National Football League and NFL Properties, LLC (collectively, the "NFL Parties") and certification of the Class and Subclasses.

2. On January 24, 2012, I filed a complaint, through my attorney Steve Marks of Podhurst Orseck, PA, against the NFL Parties in the United States District Court for the Southern District of Florida (*Wooden, et al. v. National Football League*, Case No. 1:12-cv-20269-JEM). That action was transferred to this MDL on February 23, 2012. Thereafter, on June 7, 2012, a Master Administrative Class Action Complaint for Medical Monitoring was filed on my behalf in the MDL [ECF No. 84]. In that complaint, I alleged that I sustained repetitive traumatic head impacts during NFL games and/or practices, and that I am at increased risk of suffering from brain injuries caused by these head impacts.

3. Throughout these proceedings, I have followed the litigation closely. I have had various meetings, telephone conferences and email exchanges with my counsel Steve Marks about the status of proceedings, the NFL Parties' motions to dismiss my case on grounds of preemption, and the oral argument on the NFL Parties' motions to dismiss, among other things. In addition, I have reviewed numerous press articles about the litigation and the settlement.

4. After the Term Sheet was announced, and when the original representative for Subclass 1, Mr. Corey Swinson, passed away suddenly in September, 2013, beginning in about

October, 2013, my counsel informed me of the negotiations between the Plaintiffs and the NFL Parties regarding the Settlement Agreement and exhibits. I met with Arnold Levin of Levin, Fishbein, Sedran & Berman, and his partner Daniel Levin, on October 16, 2013, in their offices in Philadelphia, Pennsylvania regarding my representation of Subclass 1 Class Members in the proposed class action. I had a number of questions regarding the settlement and proposed class action, and I discussed these issues in detail with Arnold Levin. He answered all of my questions, and I agreed to participate as the representative plaintiff of Subclass 1 since I supported the settlement.

5. I monitored the progress of settlement negotiations, through Steve Marks and Arnold Levin, and I reviewed with counsel drafts of the Settlement Agreement and exhibits. I also continued to follow the press stories about the settlement.

6. In or about early January, 2014, I authorized the filing of Plaintiffs' Class Action Complaint on my own behalf and on behalf of Class Members in Subclass 1 [ECF No. 5634-1]. At the same time I also authorized and approved of the Class Action Settlement Agreement dated January 6, 2014, which was filed with the Court [ECF No. 5634-2].

7. After the Court denied Plaintiffs' motion for preliminary approval of the Settlement without prejudice, through communications and mailings with Steve Marks and Arnold Levin, I continued to stay apprised of the settlement talks and of the numerous drafts of the revised Settlement Agreement, and I ultimately approved the final Settlement and exhibits submitted to the Court on June 25, 2014 [ECF No. 6073-2].

8. On July 7, 2014, the Court preliminarily approved the Settlement and conditionally certified the Settlement Class and two Subclasses [ECF No. 6084]. In its Preliminary Approval Order, the Court appointed me to serve as Subclass Representative for

Subclass 1 (§ 2(c)(i)), which consists of “Retired NFL Football Players who were not diagnosed with a Qualifying Diagnosis [Level 1.5 Neurocognitive Impairment (early Dementia), Level 2 Neurocognitive Impairment (moderate Dementia), Alzheimer’s Disease, Parkinson’s Disease, ALS, and/or Death with CTE (chronic traumatic encephalopathy)] prior to the date of the Preliminary Approval and Class Certification Order and their Representative Claimants and Derivative Claimants.” (§ 2(b)(i)). The Court appointed my attorney Steve Marks to serve as Class Counsel (§ 3(a)) and Arnold Levin to serve as Subclass Counsel for Subclass 1 (§ 3(c)).

9. I strongly support this Settlement and urge the Court to grant final approval to the Settlement and to certify the proposed Class and Subclasses.

I declare that the foregoing is true and correct.

Executed this 10th day of November, 2014.


SHAWN WOODEN

Sworn and Subscribed before me
this 10 day of November, 2014


NOTARY PUBLIC

